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SIPDIS  
NEA/IR  
USEU FOR NEMROFF AND SNYDER  
TREASURY FOR EDDY AND KOHLER

E.O. 12958: DECL: 8/12/2018  
TAGS: [EFIN](#) [ECON](#) [KNNP](#) [PARM](#) [PGOV](#) [PREL](#) [MNUC](#) [IR](#) [GM](#)  
SUBJECT: GERMAN MFA PROMOTES EU'S COMMON POSITION ON UNSCR  
1803

REF: BERLIN 884

Classified By: Global Affairs Unit Chief  
Don Brown, for reasons 1.4 (b) and (d)

11. (C) Summary: German Ministry of Foreign Affairs (MFA) contacts tout the EU's recently adopted Common Position (CP) as going beyond UNSCR 1803 and expect quick adoption of the CP's required annexes. End Summary.

12. (C) Econoff met with Julian Luebbert, German MFA Desk Officer for Iran Financial Sanctions; Andreas Krueger, Head of the MFA's Iran Unit; and Stefan Bantle, MFA Syria Desk Officer to discuss the German government's view of the process and timetable for full implementation of the EU's just-announced CP on UNSCR 1803. In the officers' view, the remaining tasks in the process are to complete the annexes listing 1) additional embargoed dual-use goods and 2) financial institutions subject to "continuous vigilance". Krueger emphasized that the CP's imposition of strict transactional reporting requirements on Bank Saderat as well as the CP's soon to be expanded list of embargoed dual use goods goes well beyond UNSCR 1803. The MFA officers indicated that they expect the EU to adopt the new annexes "in a matter of weeks" following an initial proposal from the European Commission. (Note: While the CP also imposes strict requirements on Iran Air Cargo and Islamic Republic of Iran Shipping Lines, MFA officers did not stress their inclusion to Econoff. End Note.)

13. (C) Krueger also commented to Econoff that the German government is taking a more critical look at proposed German investments in Iran, as their hoped-for changes in the Iranian regime's behavior have not come to pass. He claims the GOG is being "more critical than they were 1-2 years ago." (Note: Krueger did not detail what specific actions have been taken on the basis of this "new" approach. End Note.)

14. (C) Comment. The CP, as adopted, reflects the comparatively stronger position Germany sought, as described in reftel. The financial institutions and goods ultimately included in the implementing annexes will be the best indicators of German and EU robustness in this latest round of Iranian trade and financial sanctions. End Comment.

TIMKEN JR